

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2, individually  
and on behalf of all others similarly situated, JANE  
DOE 3, individually and on behalf of all others  
similarly situated, JANE DOE 4, individually and on  
behalf of all others similarly situated, JANE DOE 5,  
individually and on behalf of all others similarly  
situated, and JANE DOE 6, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS, FIRST LADY CECILE DE  
JONGH, GOVERNOR KENNETH MAPP,  
SENATOR CELESTINO WHITE, ATTORNEY  
GENERAL VINCENT FRAZER, GOVERNOR  
JOHN DE JONGH, SENATOR CARLTON DOWE,  
DELEGATE STACEY PLASKETT, and JOHN  
DOES 1-100,

Defendants.  
-----X

**Civil Action No:**

1:23-cv-10301-AS

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated  
December 14, 2023, plaintiff Jane Doe 6 by and through undersigned counsel, respectfully seeks  
an Order from this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl  
Street, New York, New York 10007, for leave to proceed anonymously under a pseudonym in this  
action pursuant to Rule 10(a) of the Federal Rules of Civil Procedure.

Dated: December 14, 2023  
New York, New York

Respectfully submitted,

**MERSON LAW PLLC**

By: /s/ Jordan Merson

Jordan Merson, Esq.  
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*Counsel for Plaintiff*